

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 EASTERN DIVISION
4
5 ROOSEVELT PARKER,
6 Plaintiff,
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8 VERSUS CIVIL ACTION NO. 2:22-cv-45-HSO-BWR
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10 STATE FARM FIRE AND
11 CASUALTY COMPANY,
12 Defendant.

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VIDEOCONFERENCE DEPOSITION OF SCOTT BERBERICH

Taken via Zoom Videoconference Software, on
Tuesday, January 10, 2023, beginning at
1:00 p.m.

1 calculation of one of the line items that has
2 depreciation applied, you should be able to
3 determine what that percentage is.

4 Q. All right. Do you know if he applied the
5 same amount of percentage on each item throughout
6 this estimate or if it varied based on the item?

7 A. I don't know.

8 Q. All right. And so it's fair to say you
9 don't know how he came up with whatever percentage
10 figure he used?

11 A. Well, like I said, depreciation is an
12 opinion, no matter how you apply it. It's based
13 on opinion. So it -- if he chose a percentage,
14 then that's his opinion of what the depreciation
15 should be.

16 Q. All right. And so do you agree with what
17 he's put down in depreciation throughout this
18 estimate?

19 A. No.

20 Q. Okay. And in what respect do you
21 disagree with his amount of depreciation?

22 A. In my opinion, it should have had higher
23 depreciation applied.

24 Q. I want to go through this estimate in a
25 little more detail. I hope to not look at every